

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

United States of America

:

:

v

: Case No. : GLR-14-559

Richard Mariano

:

Defendant

MOTION TO MODIFY CONDITIONS OF RELEASE

NOW COMES attorney Russell A. Neverdon, Sr., and respectfully requests that this **HONORABLE COURT** modify the above-named defendant's conditions of pre-trial release in recognition of the Christmas Holiday and states in support thereof as follows:

1. That counsel has spoken with Pre-Trial Release Probation Officer, Joseph Curse who does not oppose said request.
2. That the Defendant specifically requests an overnight visit with his minor children commencing 8:00 p.m. December 24, 2014 and ending 10:00 p.m., December 25, 2014 at 6101 Gentry Lane, Baltimore, Maryland 21210 with the mother of said minor children, Christina Hamilton.
3. That the Defendant has been otherwise cooperative and abided by all the terms and conditions of pre-trial release and poses no risk of flight.

WHEREFORE, the Defendant respectfully requests that this Honorable Court GRANT the Modified Conditions of Release, specifically the schedule of an overnight visit at 6101 Gentry Lane, Baltimore, Maryland 21210 with the minor children and Christina Hamilton.

_____/s/_____
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